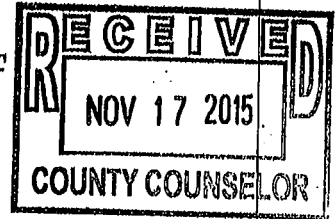


IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



ORIGINAL

TRACEY WHITE, et al.,)

Plaintiffs,)

vs.)

Cause No. 14-cv-01490-HEA

THOMAS JACKSON, et al.,)

Defendants.)

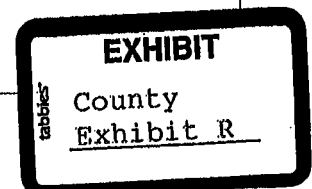
VIDEO DEPOSITION OF KERRY WHITE

Taken on behalf of the Defendants
BELMAR and ST. LOUIS COUNTY

October 13, 2015

Reported by: Christine A. LePage, CCR #1000

LePAGE REPORTING SERVICE
1465 Wilkesboro Drive
Dardenne Prairie, Missouri 63368
(314) 616-2113



1 Innovations?

2 A I seen it online, I applied, went up and showed
3 them a lot of my work, and I was hired the same day.

4 Q So what kind of work do you do photography-wise?

5 A I do family portraits, I do weddings, events,
6 school portraits, I mean, anything that has to do with
7 photography.

8 Q Have you ever been employed by any like news
9 agency?

10 A I haven't been employed by them, but I have sent
11 images over to them in which they really -- they posted
12 and, what do you say, what do you call, like -- they
13 posted it and used it on their website and their Facebook
14 page.

15 Q So who did you send images to that used them?

16 A I sent it to their Facebook.

17 Q For what?

18 A Fox 2 and News Channel 4 Facebook page.

19 Q Did you get paid?

20 A No.

21 Q How many Fox 2 of your photos were --

22 A How many images?

23 Q Yes.

24 A They posted four images, but I posted about ten
25 and they used four of them.

1 Q So what do you mean you posted, how does that
2 work?

3 A I posted on their Facebook page.

4 Q On your Facebook page?

5 A On their Facebook page.

6 Q Oh, okay.

7 A Yeah, you can post pictures on their Facebook
8 page, and if they accept it or if they repost it or
9 something like that, and it gets recognition otherwise.

10 Q But they don't pay you for that?

11 A No.

12 Q So have you ever been paid for any media
13 photographs that you've --

14 A No, not yet.

15 Q -- that you've done?

16 A But I do know photographers who have, trying to
17 get some money.

18 Q And then when did you stop working for Portrait
19 Innovations?

20 A I think it was maybe 2013.

21 Q So who have you been -- You've been working for
22 the same place --

23 A I was working at DHL until June of 2014, and
24 then I started doing photography full time.

25 Q Okay. And tell me again, I'm sorry, you told me

1 A What do you mean what type of customers?

2 Q Like what type of work do you do freelance-wise?

3 A I mean, I've done it all, from weddings to
4 gospel album covers to whatever.

5 Q And your employer, you didn't have an employer
6 that sent you to Ferguson in August of 2014 to take
7 photographs; is that true?

8 A No, I didn't, it was -- my aunt lives over there
9 in the area, I grew up there, and it was just a moment
10 that needed to be captured.

11 Q Do you have any hobbies?

12 A Hobbies. I mean, my only hobby is taking care
13 of my kids right now, because any time after that I'm
14 working.

15 Q And how old are your kids?

16 A One and two.

17 Q Okay.

18 A Yeah.

19 Q Have you ever been a plaintiff or a defendant in
20 another lawsuit?

21 A No.

22 Q And have you ever filed any claims for personal
23 injuries in the past?

24 A Not that I recall.

25 Q Have you ever been convicted of a felony or

1 A Uh-huh.

2 Q -- sometime between August 12th and August 13th,
3 sort of like midnight, like a little afterwards; does that
4 sound correct to you?

5 A Yeah, I mean, it was -- yeah, it was late, but
6 it wasn't midnight, it was probably around 10.

7 Q It was before midnight?

8 A Yeah.

9 Q So that would have been on the 12th?

10 A Yeah.

11 Q Okay. Had you been to the Ferguson -- the same
12 area where you were arrested or Ferguson between the time
13 that Michael Brown was killed and the night of your
14 arrest?

15 A You mean like before the time?

16 Q Yeah, any other times that you were in that
17 area.

18 A Yeah.

19 Q Okay. So when was the first time that you went
20 over there after his death?

21 A Well, I rode through right after his death, but
22 I didn't go down that street, I just rode through West
23 Florissant, I was like what's all the people doing out
24 here, and they told me what happened, I just kept going
25 about my day, and I came back through and I checked on my

1 Q So you live -- You said that you live on
2 Cloverdale Trails?

3 A Cloverfield Trails.

4 Q Yeah, Cloverfield Trails?

5 A Uh-huh.

6 Q How far is that from --

7 A It's right off of 270 and Halls Ferry.

8 Q Okay. So milewise from like, let's say,
9 Chambers and West Florissant?

10 A I'd say maybe three miles maybe. It's not far
11 at all.

12 Q So you didn't actually go to any protest or see
13 people protesting on the night of Michael Brown's death?

14 A Not on the night of his death, no.

15 Q Oh, okay. I'm sorry, I misunderstood you. So
16 when is the next time that you went to the area?

17 A The following day.

18 Q So that would have been on the 10th; does that
19 sound right?

20 A Yeah.

21 Q Okay. So what did you do on the 10th?

22 A I went out and took some pictures of like the
23 QuikTrip and the -- took some pictures of all the places
24 that were looted and got pictures of people cleaning up
25 and stuff like that.

1 Q So that was after the QuikTrip burned?

2 A Yeah.

3 Q Okay. And there was looting?

4 A Yeah.

5 Q Yeah.

6 A I mean, I wasn't there for the looting, I just
7 got aftermath pictures.

8 Q So what time did you take these pictures?

9 A I got out early in the morning, maybe about
10 8 o'clock, 7, 8 o'clock.

11 Q A.m.?

12 A Yeah.

13 Q And so you took the pictures in the morning?

14 A Uh-huh.

15 Q So that would have been on the morning of the
16 11th; does that sound right?

17 A Whatever -- I mean, I don't know exactly what
18 the dates were back then, but, yeah.

19 Q So the morning after the QuikTrip burned --

20 A Yeah.

21 Q -- you went out and took pictures?

22 A Yeah.

23 Q So what -- You said the QuikTrip burned, and you
24 said you took pictures of some looting?

25 A I didn't shoot the looting, I shot the looted

1 stores.

2 Q Okay. So what stores were those?

3 A I got images of all the stores -- well, the Auto
4 Zone, I got images of the liquor store that was looted,
5 and I had some images from down where I live where people
6 looted at around Halls Ferry, New Halls Ferry, where there
7 was a bunch of different stores around, by Shop 'n Save
8 and stuff like that.

9 Q So what did the images show?

10 A Just a bunch of broken glass and racks and stuff
11 knocked over.

12 Q Why did you take those images?

13 A Because they mean something. It's a life
14 touching moment, and I felt like it should have been
15 captured.

16 Q Okay.

17 A And then the fact of people out there helping
18 clean up and they had nothing to do with it or even if I
19 know live in the area, but it was just touching that they
20 were out there doing that, and the community came together
21 right.

22 Q So how long did you spend out taking images on
23 the morning after the QuikTrip burned?

24 A I was in and out of the area all day. I mean, I
25 was -- just whenever I could, I'll stop through, see some

1 other vehicles, and it was a tactical vehicle out there,
2 too.

3 Q How many police did you see?

4 A I couldn't count them.

5 Q Were there any people in front of the police
6 line, like between you and the intersection?

7 A Yeah, it was people out there.

8 Q How many would you say?

9 A I don't recall, but I'm pretty -- I'm pretty
10 sure that they were outnumbered by the police at that
11 intersection.

12 Q And how many police?

13 A I don't recall that. I know it was a lot,
14 though, I can't --

15 Q Would you say that there was more or -- more or
16 less than a hundred people in that area other than police?

17 A Probably a little less. I'd say maybe 75
18 people.

19 Q Okay.

20 A Versus a hundred cops. But it was -- it was
21 still a hostile moment.

22 Q What do you mean?

23 A I mean, people had their tempers and everybody
24 was yelling, but --

25 Q So you heard people yell at the police?

1 Q Could you hear any announcements from the police
2 over a loud speaker?

3 A Yes.

4 Q And what were the police saying?

5 A They said to disperse the area.

6 Q Did you notice whether there was any smoke or
7 gas or tear gas or anything?

8 A Yes, it was smoky out there.

9 Q How about tear gas, were you personally
10 subjected to any?

11 A Not when I was on Lorna, I mean, not on Lorna,
12 but at the church, but once they began firing it on Lorna,
13 then I was.

14 Q Okay. So you went up to the church, which is on
15 Chambers, right?

16 A Yes.

17 Q And it's about -- how far is the church from the
18 intersection, like a block or two?

19 A Yeah, about a block and a half maybe.

20 Q Okay. And it's on the south side of Chambers;
21 is that right?

22 A Yep.

23 Q Okay. So how long -- So you said you pulled
24 your car into that church parking lot?

25 A Uh-huh.

1 Q -- to that church on Chambers?

2 A Uh-huh.

3 Q The parking lot that you --

4 A Right.

5 Q -- talked about? Okay. So you wait in the

6 parking lot for about 20 minutes, you said?

7 A About 15, yeah.

8 Q Fifteen, I'm sorry. And then you turn onto

9 Lorna, and you park on the west side of the street, and

10 are you facing -- is your car facing which way?

11 A It's facing south.

12 Q Okay. There's a side street, it's called

13 Kappel, I think?

14 A Down here, (indicating)?

15 Q Yes.

16 A Kappel?

17 Q Yeah.

18 A Yeah, we was facing Kappel.

19 Q Okay. And so how long -- Did you just stop or

20 what happened?

21 A Yeah, we stopped and waited for a minute, and

22 then next thing I know I see police officers coming down,

23 and they stopped at the end of Lorna.

24 Q Okay. Let me just stop you there for one

25 second, okay?

1 A Okay.

2 Q When you stopped on Lorna, did you have the
3 motor of your car on or off?

4 A On.

5 Q Did you ever turn the motor of your car off?

6 A No.

7 Q Why not?

8 A Because I didn't know what was going on and I
9 wasn't actually parked yet, I haven't talked to Tamisha
10 and let her know I was outside or anything like that, so I
11 didn't want to turn my vehicle off, especially when it was
12 still a lot of people out there.

13 Q And at that point did you have the windows to
14 your car rolled up or down?

15 A Up.

16 Q Up?

17 A Yes.

18 Q Okay. Could you hear what was going on outside?

19 A Yeah, you could hear, it was loud.

20 Q Did you have your radio on in your car?

21 A No.

22 Q So how long did you stay in the house, I guess,
23 catty-corner from Tamisha; is that right?

24 A Well, what happened was when we pulled down and
25 I stopped, I turned the car around and I started to

1 then you turned around, you stopped for a little while?

2 A For a quick second, I mean, I guess.

3 Q Okay. So why did you stop for a quick second?

4 A Because I was trying to figure out what was
5 going on.

6 Q And so what was your plan going to be?

7 A Call Tamisha and try to run in her house.

8 Q And did you have your cell phone with you?

9 A Yes, I did. My phone actually went dead.

10 Q Do you know whether either Kai or Sandy had a
11 cell phone?

12 A Sandy had his cell phone.

13 Q Did he call Tamisha?

14 A No, I didn't have her number at the time either.

15 Q Okay. All right. So tell me, you know, kind of
16 go in slow motion what happened.

17 A Okay. So pretty much what I can recall is when
18 we came down and turned down Lorna, I stopped for a second
19 to try to find Tamisha's number, and at that time my phone
20 went dead, and I made a U-turn, and that's when the police
21 line was there.

22 Q Okay. You made a U-turn about halfway up the
23 street, halfway up Lorna?

24 A Yeah, just about.

25 Q Okay. And then what happened?

1 A A line of police officers began marching down
2 Lorna, and I stopped my vehicle, and I held my camera out
3 the window and I let them know like, "Yo, hey," and I was
4 waving my hand and everything.

5 Q Why did you hold your camera out the window?

6 A To hopefully let them know like I was just
7 working, trying to get pictures.

8 Q Okay.

9 A And from there officers began firing tear gas
10 and rushed over, took the camera out of my hand and threw
11 it on the ground.

12 Q How long were you on Lorna total?

13 A I don't recall the exact time.

14 Q Like how long were you there before the police
15 arrived?

16 A It wasn't that long at all, because we left the
17 house at about maybe 9:30, and by 10:45, I think, we were
18 being arrested.

19 Q And between the time that you left the house,
20 you stopped at Rally's, you went through the drive-
21 through --

22 A Uh-huh.

23 Q -- and then you went up and sat in that parking
24 lot for 15 minutes at the --

25 A Pulled up to the church.

1 Q -- at the church on Chambers?

2 A Uh-huh, sat for a second and --

3 Q And then you went down Lorna; is that right?

4 A Yeah. Yep.

5 Q Did you see any people in front of the police
6 line that came down Lorna?

7 A I mean, I did see some people come down.

8 Q How many would you say?

9 A They were dispersing throughout yards and
10 everything, so -- I mean, I wasn't sure what was going on
11 or nothing.

12 Q Were they running?

13 A Yeah.

14 Q Can you give an estimate of the number of
15 people?

16 A It was about 50 people maybe.

17 Q That were coming down Lorna?

18 A Not down Lorna, but down every street, they
19 were -- people were -- as police were marching down
20 Chambers, people were just going down different streets
21 trying to get away.

22 Q How do you know that?

23 A Because I was there.

24 Q I mean, so what I understand you saying, though,
25 is that as soon as the police say disperse and leave, then

1 marching down.

2 Q What do you mean the flash bangs?

3 A Police began firing flash bombs.

4 Q Did you know what those were?

5 A Yeah.

6 Q How did you know that?

7 A I watch a lot of TV.

8 Q So, I mean, what is your understanding of the
9 purpose of those?

10 A To clear the area.

11 Q Okay. So how far had the police line moved
12 between when you first saw it at the corner of West
13 Florissant and Chambers before you pulled out of the
14 church parking lot?

15 A Maybe once -- once they got right about to
16 the -- when I seen them coming down Chambers, period,
17 that's when I said, "Oh, man, we got to go," so we left
18 the lot.

19 Q And then -- And there were -- How many people
20 would you say were in front of that police line at that
21 point?

22 A I don't recall the exact, but, I mean, they were
23 running and dispersing also, so -- I mean, you can't
24 really count how many people it was.

25 Q Now, I can't remember if I asked you this

1 before, and I'm not trying to --

2 A Oh, you're fine.

3 Q -- reask things, I'm really not. Did you ever
4 see anybody throw anything at the police?

5 A No.

6 Q Any rocks or bottles or anything?

7 A No. I didn't see anything thrown.

8 Q Did you hear anybody threaten to kill the police
9 or say that they were going to -- hear something like,
10 well, we're going to kill you or we're going to kill your
11 family, anything like that?

12 A I heard plenty of negative comments, but I
13 wasn't -- I mean, I heard -- I heard a lot.

14 Q Negative comments directed to the police?

15 A I guess you could say that.

16 Q Like can you give an example?

17 A I don't -- I mean, it was -- they were shouting
18 out all type of obscenities.

19 Q At the police?

20 A Sure.

21 Q Okay. That's what I --

22 A Yeah, yeah, they were.

23 Q That's what I'm asking you.

24 A Yeah.

25 Q All right. So you -- I'm just trying to get

1 another understanding of what happened on Lorna. You
2 turned down Lorna, and then you said you stopped for --

3 A I stopped and tried to make a phone call.

4 Q And so how long were you stopped?

5 A It was short.

6 Q Had the police turned around the corner to enter
7 Lorna before you moved from your parking place?

8 A No.

9 Q So in other words, if I understand what you're
10 saying, you saw the police round and enter onto Lorna,
11 correct, like a police line?

12 A Yeah.

13 Q But you were already like pretty close --

14 A Uh-huh.

15 Q -- to where they were, right?

16 A Yes.

17 Q So you were still like kind of fooling with your
18 cell phone or trying to get a hold of Tamisha at that
19 point; is that right?

20 A Not when they were walking towards me. Once
21 they started marching towards me, I knew then that don't
22 move.

23 Q All right. So at that point when the police
24 started marching toward you, you are facing towards --

25 A Chambers.

1 A A police line began marching from the front, and
2 we were being fired up on with -- from the back.

3 Q Okay. How far was the police line from you when
4 you first turned around?

5 A They were at the corner.

6 Q So as you turned around, the police line was at
7 the corner is what you're saying?

8 A Uh-huh.

9 Q Was that at the same time?

10 A At the same time as what?

11 Q As you turn around is when you saw the police
12 line?

13 A Yeah.

14 Q Okay. Then what?

15 A I was -- I pulled up a little and I stopped and
16 I held my camera out the window.

17 Q How far did you pull up?

18 A Maybe a house or two.

19 Q Did you have your headlights on at that time?

20 A Yes.

21 Q Okay. So how far away were you from the police
22 line when you first saw it?

23 MR. SHABAZZ: Objection, asked and answered
24 about three times.

25 A You said -- What did you say?

1 police, and then there's the tactical truck behind the
2 line?

3 A Yes.

4 Q Okay. So how far are you from Kap- -- from the
5 line of police officers that's coming down Kappel?

6 A I was -- I don't know, I guess I was pretty far,
7 yeah.

8 Q Okay. Then what happened?

9 A I held my camera out the window, and my camera
10 was taken out of my hand, and we were snatched out of the
11 car and thrown on the ground.

12 Q Who took your camera out of your hand?

13 A Some police officer, I don't know.

14 Q Do you know what the police officer looked like?

15 A Not other than his skin color.

16 Q What was his skin color?

17 A He was white.

18 Q What did he have on? What kind of uniform or
19 dress did he have on?

20 A I don't recall that.

21 Q How many police officers were around your car at
22 that point?

23 A I don't know, it was a lot, I was on the ground
24 at the time.

25 Q Did you hear any police officers say, "Stop"?

1 Q Did you say anything to the police officer
2 before he took the camera out of your hand?

3 A I was just letting them know that -- I told them
4 that I was a photographer and I was here shooting images.

5 Q Did you tell them that you were a photographer
6 before he took the camera out of your hand?

7 A Yes.

8 Q How big --

9 A I was yelling it, I don't know if he heard it or
10 not, but I was yelling it.

11 Q Was it loud in the area?

12 A Yes.

13 Q How big was your camera?

14 A It was pretty big, I had -- Let me see. I wish
15 I can -- If I had something to show you an example.

16 MR. SHABAZZ: It's all right.

17 A It was pretty big.

18 Q (by Ms. Gunn) Like see that black notebook on
19 the table?

20 A Yeah, it's bigger than that.

21 Q Okay. So how big would you say that notebook is
22 right there?

23 A Probably, I don't know, about seven inches
24 maybe.

25 MR. SHABAZZ: Objection. Objection,

1 Q (by Ms. Gunn) Yes.

2 A Yeah, I walked.

3 Q And were any officers escorting you?

4 A Yes.

5 Q How many?

6 A Two.

7 Q Did you see what they looked like?

8 A I did, but I don't recall.

9 Q Did you notice any name badges on any officers
10 who you encountered that night?

11 A No.

12 Q Did you look for any name badges?

13 A Yeah, I did.

14 Q Okay. Could you tell whether they were covered
15 up or not?

16 A They weren't on at all, because I know that
17 they're pinned to the uniforms.

18 Q And you just didn't -- You didn't see any
19 badges?

20 A No. Some officers had on all black and some had
21 the brown St. Louis County uniform on.

22 Q The officers who approached your car, how many
23 were there?

24 A I don't recall, because they were coming from
25 everywhere, I mean, they surrounded the vehicle really

1 on.

2 Q You said that there were some officers who had
3 brown uniforms on?

4 A Uh-huh.

5 Q Did you see what any of them did?

6 A No.

7 Q What kind of handcuffs were you placed in?

8 A I was placed in metal handcuffs until we got to
9 the -- in the back of the truck, and they put the zip ties
10 on us.

11 Q So they took the metal ones off and put zip ties
12 on?

13 A Uh-huh.

14 Q In the truck?

15 A As we were entering the truck.

16 Q Had you ever been arrested before? Oh, you told
17 me that.

18 A Yes.

19 Q Okay. How long did you sit on the corner of
20 Chambers and Lorna?

21 A In the truck?

22 Q Well, did you have to wait for a truck to show
23 up?

24 MR. SHABAZZ: Objection, he never said he sat on
25 the corner of Chambers and Lorna.

1 that you were escorted to the corner of Chambers and
2 Lorna?

3 A Not that I can recall.

4 Q Was there any profanity that was used?

5 A No.

6 Q What happens when you got to the corner then?

7 You said that the handcuffs were exchanged?

8 A Yeah.

9 Q And then what happened?

10 A We were placed into the back of the truck.

11 Q Okay. And then you were taken to Clayton; is
12 that right?

13 A Yeah, after sitting for a while in the wagon.

14 Q How long were you in the wagon?

15 A Maybe about -- about an hour, 40 minutes maybe.

16 Q You were taken to Clayton, and what happened in
17 Clayton?

18 A They took us into this big holding cell.

19 Q Was it like a cell where you were locked in?

20 A Yeah.

21 Q And how long were you in there?

22 A I mean, they began booking people then, they
23 were running names and booking people, and we had to go
24 from one area to another and be searched and all that,
25 pictures and stuff.

1 Q White?

2 A Uh-huh.

3 Q Where did you go after she picked you up?

4 A I went to my house and I tried calling around to
5 find where my car was, and she took me to where it was.

6 Q Where was it?

7 A On Lindbergh at some towing lot, I don't
8 remember the name of it.

9 Q And you were able to get your car out that day?

10 A Yeah, after paying.

11 Q How much did you have to pay?

12 A I don't recall the exact amount for that, but I
13 know I had to pay to get it out the impound.

14 Q Was there anything missing from your car after
15 you got it out of impound?

16 A Nothing missing. My camera was in the back seat
17 on the floor, and the only thing that was missing was my
18 memory card.

19 Q Was the camera damaged in any way?

20 A Yes.

21 Q How was it damaged?

22 A It had a lot of scratches, my button sometimes
23 got stuck, and it's missing the eye piece.

24 Q Okay. Can you hand me that -- Okay. So
25 there's -- On this Exhibit K there's a picture on the

1 A Yeah, I heard gunfire.

2 Q Did you know where it was coming from?

3 A No, but I -- it was way down West Florissant, I
4 heard it, it was distant, there was never no gunfire like
5 next to me type.

6 Q What about when you were in the parking lot of
7 the church?

8 A I don't recall hearing gunfire when I was on the
9 parking lot.

10 Q Did you see any members of the Black Panther
11 party that night?

12 A No.

13 Q And did you see Mr. Shabazz?

14 A No, not that night. I didn't meet Mr. Shabazz
15 until later, after.

16 Q How much time passed between when the police
17 skirmish line turned onto Lorna Lane and you were
18 arrested?

19 A How much time has passed?

20 Q Right.

21 A What do you mean?

22 Q Like how long did that take? Between the time
23 that the police turned onto Lorna Lane and you were
24 actually arrested, how many minutes?

25 A Oh, it was seconds, they were marching fast and

1 surrounded the car real quick.

2 Q Was there a helicopter out there?

3 A I seen a helicopter in the vicinity, yes.

4 Q Did you see a light or a beam from the
5 helicopter shine in your direction?

6 A No, not in my direction.

7 THE VIDEOGRAPHER: We have three minutes
8 remaining.

9 MS. GUNN: Okay, go ahead and change, I'm almost
10 done, though.

11 THE VIDEOGRAPHER: Okay. We're going off the
12 record at 4:59 p.m.

13 (Whereupon a three-minute recess was taken.)

14 THE VIDEOGRAPHER: And we're back on the record
15 at 5:02 p.m.

16 Q (by Ms. Gunn) In your car as you were driving,
17 who was sitting where?

18 A I was in the driver's seat, Sandy was in the
19 passenger seat, and Kai Bowers was in the back.

20 Q Did either Kai or Sandy have the camera?

21 A No.

22 Q You always had control of the camera?

23 A Yes.

24 Q Do you know whether Kai or Sandy had finished
25 eating their food before you got to Lorna Lane?

1 A No, they were still eating. Actually Sandy had
2 an apple pie that he had dropped out of the car that was
3 on his lap at the time of the arrest, and that's how we
4 knew exactly where we were arrested and we could -- that's
5 where I was looking for my pieces for my camera.

6 Q Were you -- Were you injured?

7 A No.

8 Q Did the police use any force on you?

9 A Not out of the ordinary. I mean, they were
10 forceful.

11 Q They put handcuffs on you?

12 A They slammed us to the ground and handcuffed us,
13 but, I mean, it's not nothing -- nothing out of the
14 ordinary than what they usually do.

15 Q This camera equipment that was in your car, was
16 it in the trunk or in the passenger --

17 A The camera?

18 Q Well, any camera equipment, like the lights
19 and --

20 A The lights and stuff were in the trunk.

21 Q Was there anything other than the camera itself
22 that was in the passenger compartment?

23 A No.

24 Q Did you go back to the scene of Lorna Lane?

25 A Yeah.

1 Q Okay. When was that?

2 A The day after I got out.

3 Q Who did you go with?

4 A Me and Sandy.

5 Q Okay. And what did you see?

6 A We saw the piece of pie and we saw empty tear --
7 I mean, empty canisters.

8 Q That are shown in Exhibits I and J?

9 A Yes.

10 Q Did anyone use one of those flash -- what did
11 you call them, those -- that make a lot of noise?

12 A The mini bangs, the flash bangs?

13 Q I don't know, whatever you call them.

14 A Yeah.

15 Q Did anyone use one of those on you?

16 A They shot them around the vehicle, yeah.

17 Q How many?

18 A I'm not sure.

19 Q Do you know who did that?

20 A No, I don't.

21 Q So what -- Tell me what -- You have Pictures I
22 and J, tell me what these are supposed to show.

23 A These are expired flash bangs that was used by
24 the police at the time of the -- that I was being
25 arrested, well, that were around my vehicle.

1 Q How many did you find around your vehicle?

2 A Around the area?

3 Q Around your vehicle.

4 A The vehicle wasn't there no more.

5 Q Okay. Around the area where your vehicle had
6 been.

7 A I found two.

8 Q And what are these other things that are in the
9 picture?

10 A Other pieces of the flash bangs. I don't know
11 what this is, (indicating,) or what that is, (indicating).

12 Q You're showing -- You're pointing to something
13 that's in the photograph on Exhibit I --

14 A Exhibit I.

15 Q -- towards the top of the photograph?

16 A Uh-huh. Yeah, I'm not sure what this is and
17 what that is, (indicating).

18 Q So these are the --

19 A But these here are handles or clamps that attach
20 to the mini flash bangs.

21 Q And how do you know that?

22 A Because I assembled -- I reassembled it and that
23 was how it went.

24 Q Anything else that you found when you went back
25 to Lorna?

1 camera that can reach that distance.

2 Q Okay. Sort of like a photographic --

3 A Uh-huh.

4 Q And were you inside or outside of a car?

5 A Outside.

6 Q I don't have anything else.

7

8 CROSS-EXAMINATION

9 QUESTIONS BY MS. SHAFAT:

10 Q I just have a few quick questions.

11 A Okay.

12 Q You said that when you were in the jail in
13 Clayton, at some point you were taken to Maryland Heights
14 jail?

15 A Uh-huh.

16 Q Did I get that right?

17 A Uh-huh.

18 Q Do you have a sense of why you were taken from
19 one jail to the other?

20 A They said that I had a warrant, but I wasn't
21 aware of it at the time.

22 Q A warrant in Maryland Heights?

23 A Yeah.

24 Q Okay. And so then when you posted bond there,
25 was that for the Maryland Heights charge or --